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Counsel for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LISA VIZCARRA, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

UNILEVER UNITED STATES, INC.,

Defendant.

Case No. 4:20-cv-02777-YGR

**STIPULATION AND ~~PROPOSED~~
ORDER RE MOTION BRIEFING**

1 The parties to the above-entitled action jointly submit this stipulation and proposed order
2 as follows:

3 WHEREAS, Plaintiff filed a renewed motion for class certification on June 17, 2022,
4 whose hearing date is set for September 27, 2022;

5 WHEREAS, the parties have conferred on a mutually acceptable briefing schedule for
6 Plaintiff's motion, to allow for sufficient time for the parties to brief the motion;
7

8 WHEREAS, in the conferral, the parties agreed that Unilever's date to oppose the
9 renewed motion for class certification should be August 16, 2022, and that Plaintiff's reply brief
10 on its motion to strike should be September 6, 2022;

11 WHEREAS, the parties having conducted this conferral prior to Plaintiff filing her
12 motion, the existing noticed hearing date of September 27, 2022, does not need to be changed;
13

14 WHEREAS, these briefing deadlines would impact no other deadlines in the case, as a
15 schedule for general discovery and summary judgment is not yet in place;

16 NOW THEREFORE, the parties stipulate and respectfully request that the Court order the
17 following:

- 18 1. Unilever's date to oppose Plaintiff's renewed motion for class certification shall be
19 August 16, 2022;
- 20 2. Plaintiff's date to submit a reply brief on its renewed motion for class certification shall be
21 September 6, 2022; and
- 22 3. The present hearing date of September 27, 2022, for Plaintiff's motion for class
23 certification, shall remain unchanged, or set to such other date as suits the Court.
24

SO STIPULATED AND AGREED TO BY THE FOLLOWING ON July 28, 2021:

REESE LLP

/s/ Sue J. Nam

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LOCAL RULE 5-1(i)(3) ATTESTATION

I, August T. Horvath, hereby attest, pursuant to N.D. Cal. Local Rule 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: June 21, 2022

By: /s/ August T. Horvath

August T. Horvath

Counsel for Defendant Unilever United States, Inc.

~~PROPOSED~~ ORDER

Based upon the stipulation of the parties and for good cause shown, IT IS ORDERED
THAT THE SCHEDULE IS REVISED AS FOLLOWS:

- Unilever's opposition to Plaintiff's renewed motion for class certification due by August 16, 2022;
- Plaintiff's reply brief on its renewed motion for class certification due by September 6, 2022.

Dated: June 27, 2022


Honorable Yvonne Gonzalez Rogers